

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG**

**MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

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**MOTION AND NOTICE OF MOTION OF THE PLAINTIFFS' STEERING  
COMMITTEE TO EXCLUDE THE OPINIONS OF  
DR. CHERYL SAENZ AND DR. KEVIN HOLCOMB**

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**PLEASE TAKE NOTICE**, that pursuant to Fed. R. Evid. 104(a), 403, 702, and 703, the Plaintiffs' Steering Committee ("PSC") hereby moves to exclude the opinions and testimony of Dr. Cheryl Saenz and Dr. Kevin Holcomb.

For the reasons set forth more fully in the following accompanying materials, the Court should grant the PSC's motion:

- The Plaintiffs' Steering Committee's Omnibus Brief Regarding Daubert Legal Standard and Scientific Principles for Assessing General Causation;
- The Plaintiffs' Steering Committee's Memorandum of Law in Support of Its Motion to Exclude the Opinions and Testimony of Defendants Gynecology-Oncology Experts Dr. Cheryl Saenz and Dr. Kevin Holcomb; and,
- Certification of Counsel with attached Exhibits.

A proposed form of order is attached.

Dated: May 7, 2019

Respectfully submitted,

/s/ Michelle A. Parfitt

Michelle A. Parfitt  
ASHCRAFT & GEREL, LLP  
1825 K Street, NW, Suite 700  
Washington, DC 20006  
Tel: 202-783-6400  
Fax: 202-416-6392  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)

/s/ P. Leigh O'Dell

P. Leigh O'Dell  
BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.  
218 Commerce Street  
Montgomery, AL 36104  
Tel: 334-269-2343  
Fax: 334-954-7555  
[Leigh.odell@beasleyallen.com](mailto:Leigh.odell@beasleyallen.com)

***Plaintiffs' Co-Lead Counsel***

/s/ Christopher M. Placitella

Christopher M. Placitella  
COHEN, PLACITELLA & ROTH, P.C.  
127 Maple Avenue  
Red Bank, NJ 07701  
Tel: 732-747-9003  
Fax: 732-747-9004  
[cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com)

***Plaintiffs' Liaison Counsel***

**PLAINTIFFS' EXECUTIVE COMMITTEE:**

Warren T. Burns  
BURNS CHAREST LLP  
500 North Akard Street, Suite 2810  
Dallas, TX 75201  
Tel: 469-904-4551  
Fax: 469-444-5002  
[wburns@burnscharest.com](mailto:wburns@burnscharest.com)

Richard Golomb  
GOLOMB & HONIK, P.C.  
1515 Market Street, Suite 1100  
Philadelphia, PA 19102  
Tel: 215-985-9177  
[rgolomb@golombhonik.com](mailto:rgolomb@golombhonik.com)

Richard H. Meadow  
THE LANIER LAW FIRM PC  
6810 FM 1960 West  
Houston, TX 77069  
Tel: 713-659-5200  
Fax: 713-659-2204  
[richard.meadow@lanierlawfirm.com](mailto:richard.meadow@lanierlawfirm.com)

Hunter J. Shkolnik  
NAPOLI SHKOLNIK PLLC  
360 Lexington Avenue, 11th Floor  
New York, NY 10017  
Tel: 212-397-1000  
[hunter@napolilaw.com](mailto:hunter@napolilaw.com)

**PLAINTIFFS' STEERING COMMITTEE:**

Laurence S. Berman  
LEVIN, SEDRAN & BERMAN LLP  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106  
Tel: 215-592-1500  
Fax: 215-592-4663  
[lberman@lfsblaw.com](mailto:lberman@lfsblaw.com)

Timothy G. Blood  
BLOOD, HURST & O'REARDON,  
LLP  
501 West Broadway, Suite 1490  
San Diego, CA 92101  
Tel: 619-338-1100  
Fax: 619-338-1101  
[tblood@bholaw.com](mailto:tblood@bholaw.com)

Sindhu S. Daniel  
BARON & BUDD, P.C.  
3102 Oak Lawn Avenue, #1100  
Dallas, TX 75219  
Tel: 214-521-3605  
Fax: 214-520-1181  
[sdaniel@baronbudd.com](mailto:sdaniel@baronbudd.com)

Jeff S. Gibson  
WAGNER REESE, LLP  
11939 N. Meridian St.  
Carmel, IN 46032  
Tel: (317) 569-0000  
Fax: (317) 569-8088  
[jgibson@wagnerreese.com](mailto:jgibson@wagnerreese.com)

Kristie M. Hightower  
LUNDY, LUNDY, SOILEAU & SOUTH,  
LLP  
501 Broad Street  
Lake Charles, LA 70601  
Tel: 337-439-0707  
Fax: 337-439-1029  
[khightower@lundylawllp.com](mailto:khightower@lundylawllp.com)

Victoria Maniatis  
SANDERS PHILLIPS GROSSMAN, LLC  
100 Garden City Plaza, Suite 500  
Garden City, NJ 11530  
Tel: 516-640-3913  
Fax: 516-741-0128  
[vmaniatis@thesandersfirm.com](mailto:vmaniatis@thesandersfirm.com)

Eric H. Weinberg  
THE WEINBERG LAW FIRM  
149 Livingston Avenue  
New Brunswick, NJ 08901  
Tel: 732-246-7080  
Fax: 732-246-1981  
[ehw@erichweinberg.com](mailto:ehw@erichweinberg.com)

Christopher V. Tisi  
LEVIN PAPANTONIO  
316 South Baylen St.  
Pensacola, FL 32502  
(850) 435-7000  
[ctisi@levinlaw.com](mailto:ctisi@levinlaw.com)

Daniel R. Lapinski  
MOTLEY RICE LLC  
210 Lake Drive East, Suite 101  
Cherry Hill, NJ 08002  
Tel: 856-667-0500  
Fax: 856-667-5133  
[dlapinski@motleyrice.com](mailto:dlapinski@motleyrice.com)

Carmen S. Scott  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Tel: 843-216-9162  
Fax: 843-216-9450  
[cscott@motleyrice.com](mailto:cscott@motleyrice.com)

Richard L. Root  
MORRIS BART, LLC  
Pan America Life Center  
601 Poydras St., 24<sup>th</sup> Fl.  
New Orleans, LA 70130  
Tel. 504-525-8000  
Fax: 504-599-3392  
[rroot@morrisbart.com](mailto:rroot@morrisbart.com)